Jerry_Goedert@URSCorp.com

11/23/2005 01:00 PM

To Sabrina Forrest/EPR/R8/USEPA/US@EPA
cc Jan_Christner@URSCorp.com
bcc
Subject Sarah Johnson

Sabrina

I was not able to get much help from Sarah regarding the two major questions from last week on treatment plant design flowrate and discharge standards. She defaults to the A72 standards for both questions. She is clear about not wanting to be on the record advocating any particular approach. I think at this point we should get the recent A72 data and base projections for each resulting metal concentration on that data for both alternatives. We can do that for various pHs and to evaluate the sensitivity.

She does not seem to be a fan of ARSG and some of its members.

As of now, I don't have a conference call set up for next week as hoped. I am open to any other courses of action you can think of...let me know. I will be out Monday and Tuesday.

Thanks
Jerry

Jerry_Goedert@URSCorp.com
11/22/2005 09:45 AM

To Sabrina Forrest/EPR/R8/USEPA/US@EPA
cc
bcc
Subject Fw: TMDL's and Standards

oops

----- Forwarded by Jerry Goedert/Denver/URSCorp on 11/22/2005 09:42 AM -----

Jerry Goedert/Denver/URSCorp
11/22/2005 09:43 AM

To "William Simon" <wsimon@frontier.net>
cc sabrina.forrest@epa.gov, Jan Christner/Denver/URSCorp@URSCORP
Subject Re: TMDL's and Standards(Document link: Jerry Goedert)

Hi Bill,

Thanks for the files. We have A72 and CC48 data thru November 2004, but would like to make projections based on as recent of data as is available.

Based on preliminary data for September, the four adit flows accounted for 41% of the total flow at CC18 and Al (54%), Cd (66 %), Cu(74%), Fe(115%), Pb(85%), Mn(89%), Zn(91%) of the load present at CC18. This compares to July where the five adits (including the Grand Mogul) accounted for 11% of the total flow at CC18 and Al (32%), Cd(41%), Cu(46%), Fe (131%), Pb (45%), Mn (50%), Zn (52%) of the load present at CC18.

Thanks again.

Jerry

"William Simon" <wsimon@frontier.net>

11/21/2005 10:32 PM

To: "Jerry Goedert" <jerry_goedert@urscorp.com>

cc:

Subject: TMDL's and Standards

Jerry, I'm sending you some information related to current conditions (to 1999), stream standards, and TMDL's for the basin. You are most interested in A72 and CC48, the Animas below Silverton which is Segment 4a and Cement Creek which is Segment 7, respectively. If you look the standards up in the Regulation No. 34 book you'll notice that under Segments 4a, 3a, and 9 they refer you to Table 1 which has the adopted monthly numeric standards, whereas Seg. 8 and Cement Creek (Seg.7) only has narrative standard relating to meeting water quality at A72. Realize that meeting water quality at A72 will be the result of remediation throughout Mineral Creek and Upper Animas as well as Cement so it won't all come from just Cement Creek. What is expected for reductions, which is what the TMDL's are based upon, at CC48 is relevant and useful to you. Nevertheless, realize that CC metal concentrations have changed, for the worse I believe, after the consent decree conditions were met and the treatment plant went off line. That means we likely will want to take more out than what we anticipated even though reductions would be coming from adits not listed in our rankings (as the Red and Bonita, Gold King, and American tunnel were not previously listed). Notice that the TMDL for Mn is the same as the current condition. In other words we didn't expect to remove much Mn so whatever we get is gravy.

Was the 80% of metal load above CC 18? you talked about being from the 4 mines from high or low flow samples?

I have more information but what I've included here is likely what you need as it has loads and flows so you can extrapolate concentrations as well. Let me know if you're missing anything or if you need other data. Bill [attachment "TMDL.xls" deleted by Jerry Goedert/Denver/URSCorp] [attachment

"TMDL Upper Animas Dec 02.doc" deleted by Jerry Goedert/Denver/URSCorp]
[attachment "TMDL Upper Animas Dec 02.pdf" deleted by Jerry
Goedert/Denver/URSCorp]

Dan Beley to get with CDPHE permit writers to discuss the treatment potential as it relates to the existing Cement Creek adopted stream standards and what a discharge permit would look like. They met and concluded that:

1) The wording of the existing stream standards (which are 1) Agricultural standards, and 2) narrative Cd, Cu, Al, Fe, Mn, Pb, and Zn standards related to meeting goals at A72 below Silverton, while both these having temporary modifications) would provide maximum flexibility for writing a discharge permit, and
2) Since the goal would be to take 4 or 5 previously unpermitted discharges and put them under a single discharge permit would be looked upon very favorably by the Division; likely resulting in a permit with discharge limits being appropriate (higher than normal) for the situation. They would be agreeable that meeting the goals at A72 would be the primary driver rather than having a discharge meet some artificial stardard impractical to obtain and irrelevant to the existing conditions of Cement Creek.
3) They recommend maintaining the temporary modifications to the CC standards.

Of course this sounds a bit warm and fuzzy but without having an application, plant design, etc. they do not have the time to devote to calculating and providing us with possible scenarios. That may come later when we get further along. However, what I was after is to make certain that the Cement Creek standards are written such that they maximize flexibility for a treatment plant discharge permit – which they apparently do.

Please forward any comments or suggestions you may have.

Bill

William Simon
<wsimon@frontier.net>

12/01/2005 01:43 PM

To: Jerry Goedert <jerry_goedert@urscorp.com>, Win Wright <wgwright@frontier.net>, Andrew Ross <andrew.ross@state.co.us>, "Anglo Saxon Properties, Ltd." <Anglo-Saxon@Cox.net>, avalpro@theglobal.net, Barb Horn <barb.horn@state.co.us>, Bill Goodhard <bill.goodhard@kinross.com>, Bill Jones <billjones@frontier.net>, Bob Owen <jrowenjr@comcast.net>, Briant Kimball <bkimball@usgs.gov>, Buck p Skillen <fpope@bresnan.net>, Carol Russell <crussell@tu.org>, Cathleen Zillich <czillich@fs.fed.us>, Chester Anderson <chester.bugsconsult@direcway.com>, Chuck Wanner <cwanner@frontier.net>, Dan Beley <daniel.beley@state.co.us>, Dan James <cheese@jamesranch.net>, David Moeser <alpine_87501@yahoo.com>, Debbie Cokes <debbie@tdma-inc.com>, "'Don Gordon '" <gordon_d@fortlewis.edu>, Douglas B Yager <dyager@usgs.gov>, Ellen Stein <estein@mountainstudies.org>, "Erickson, Wally" <wally.erickson@state.co.us>, Sabrina Forrest/EPR/R8/USEPA/US@EPA, Frank Baumgarner <fwbsenior@msn.com>, Jack Rogers <rogersoj@ci.durango.co.us>, Jeanne Trupiano <jeanne@animasconservancy.org>, Jen Ader <jen@silvertonmountain.com>, Jerry Sandell <sandellgjs36@aol.com>, Jim Herron <james.herron@state.co.us>, John Ott <ott@ekiva.net>, Jon Tuthill <tuthill@frontier.net>, Kay Zillich <zillich@fs.fed.us>, "'Koren Nydick'" <koren@cc.usu.edu>, "Krabacher, Paul" <paul.krabacher@state.co.us>, Larry Perino <larry.perino@kinross.com>, Laurie Wirt <lwirt@usgs.gov>, Matt Sares <matt.sares@state.co.us>, meagan odonnell <geovirgo@gmail.com>, Mich Burns <mburns@southern-ute.nsn.us>, Michael Holmes/EPR/R8/USEPA/US@EPA, "Myers, Joanna L (JLMYERS)" <JLMYERS@fortlewis.edu>, Paul and Stacie Rapport <psrappa@yahoo.com>, Paul VonGuerard <pbvongue@usgs.gov>, Peter McKay <commckay@hotmail.com>, Peter Butler <p_butler@earthlink.com>, Peter Miesler <perspectives@gobrainstorm.net>, Ray Johnson <rhjohnso@usgs.gov>, Rob Robinson <rob_robinson@co.blm.gov>, Russ Schnitzer <RSchnitzer@tu.org>, Ryland Gardner <Ryland@mountainstudies.org>, shawna bethell <shawnabethell@yahoo.com>, Stan Powers <spowers@uc.usbr.gov>, Stephanie Odell <stephanie_odell@co.blm.gov>, Steve Fearn <fearneng@rmi.net>, Steve Jarvis <jarvist@mindspring.com>, Tod Hennis <thennis@eazy.net>, Tom Schillaci <SchillaciT@sjc.cc.nm.us>

cc:

bcc:

Subject: Gladstone treatment discharge

Hello, For those of you who are following the issues surrounding the possible development of a Gladstone treatment facility to treat several draining mines in the area here are some news. Earlier this week I asked